



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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November 5, 2007

Ref: 8EPR-N

Libby Knotts
McKenzie Ranger District
1901 South Main Street
Watford City, ND 58854

RE: NE McKenzie Allotment Management Plan
Revisions, Final Environmental Impact
Statement
CEQ# 20070408

Dear Ms. Knotts:

The Environmental Protection Agency (EPA) Region 8 Office has reviewed the Final Environmental Impact Statement (EIS) for the NE McKenzie Allotment Management Plan Revisions for the Dakota Prairie Grasslands in western North Dakota. The EPA reviews EISs in accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 of the Clean Air Act directs EPA to review and comment on the environmental impacts of any major federal agency action.

The EIS for the NE McKenzie Allotment Management Plan Revisions evaluates the effects of livestock grazing in the northeast portion of the McKenzie district of the Little Missouri Grassland. The project area includes 28 allotments, which comprise three pastures and 50,957 acres of National Forest Service lands, 23,375 acres of private lands, and 3,394 acres of state lands. The Forest Service's action, submitted as a Final EIS and Record of Decision (ROD) in September 2007, provides for continued grazing on the allotments and revises the area's management plan to allow for adaptive measures to improve livestock management and allotment conditions. The action also allows for the implementation of a drought management strategy to reduce impacts to wildlife and forage during drought and allow for quicker recovery after drought.

EPA appreciates the Forest Service's response to our comments on the Draft EIS, which primarily focused on grazing-related impacts to water quality, riparian areas and aquatic resources. We recognize that the management plan revision contains several provisions that should maintain or improve water quality in the area, including the installation of tanks to draw

livestock away from riparian areas; increased use of herding; and the development of a strategy to protect areas from excessive forage consumption.

As stated in our comments on the Draft EIS, EPA is primarily concerned that direct and indirect water quality impacts associated with grazing are closely monitored and managed in the project area. EPA notes that the Forest Service has taken a comprehensive look at available water quality data for the area and has determined that no evidence exists to indicate that surface waters in the area do not meet water quality standards. The Draft and Final EIS cites a 2001 Forest Service survey indicating that 91% of stream reaches in the project area are meeting criteria for proper functioning condition, a metric that considers bank vegetation, channel geomorphology, sediment loading, and surface hydrology.

EPA is encouraged that a monitoring strategy is in place to assess the condition of water resources and riparian areas over time. We expect that such monitoring will provide a basis for adaptive management in the future, and will specifically reveal where localized measures may be necessary to mitigate any water quality and riparian impacts resulting from livestock. As practical and appropriate, efforts to supplement the existing monitoring regime with data on specific numerical water quality standards (e.g., temperature) may also enhance and inform resource management decisions.

Thank you for the opportunity to review and comment on this Final EIS and ROD for the McKenzie Allotment Management Plan Revisions. If you have any questions, please contact Rich Mylott of my staff at 303 312-6654.

Sincerely,

/s/ Dick Clark

For Larry Svoboda
Director, NEPA Program
Ecosystems Protection and Remediation



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